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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

New England

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Boston, Massachusetts 02114-2023

Superfund Records Center

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DECLARATION OF JOSEPH A. CAPALDO

I, Joseph A. Capaldo, declare as follows:

1. I am a former employee of The Whitney Barrel Company which was located at 256 Salem Street, Woburn, Massachusetts, at that time.
2. I worked for Whitney Barrel Company from 1973 until 1975. I worked for the J. J. Riley Company, in Woburn, from 1975 until 1977. After this, I went to work for Independent Tallow Company, and worked until 1986.
3. I was hired by young Jack Whitney in 1973 but I was brought into the company by Tommie Clark, who died in a vehicle accident in 1978.
4. Whitney Barrel Company was a barrel refurbishing company and had a process, pretty much like an assembly line. The barrels would come in, start at the beginning of the process, they are processed and then come out at the end of the process, cleaned, painted, and fully refurbished and ready for shipping, selling, etc.
5. Other employees that I recall working at Whitney Barrel are: (1) Herbie (unknown last name), (2) Anthony Carchide, deceased, former truck driver, (3) Robert DeKow, deceased, drum/barrel cleaner, (4) Thomas Clark, deceased, was the inside man at the end of the process, (5) Ronald Knight, was the outside man, tank person (refurbishing old gasoline tanks, and (6) Richard Sousa, deceased, was the outside man, and truck driver.
6. I worked all jobs, wherever I was needed. I was called a "filler-In." I

worked all over the building and sometimes, outside of the building.

7. There was a drain located in the middle of the floor on the process line. This drain went down, into the ground, and underneath the building. I do not know where it ended.

8. When work was slow, I would ride along with Anthony Carchide to go around and pick up barrels from some of the customers. I remember picking up barrels from Gillette, which I think was our largest customer. I do not remember any of the other pickups or their locations.

9. The barrels coming into the company to be refurbished, all had some kind of residue in them. **“There was always something in all of the barrels coming in.”** There was always a very offensive odor in the building, with all of the barrels coming in from different companies and the different residues in the different barrels. The residues in most of the barrels were in liquid form and there were some “glue barrels” being brought in. The glue barrels would be stored outside of the building until the count was approximately 300 or more before they were processed and refurbished. The odors from the glue barrels would make you feel light-headed.

10. I do not recall the company having a sewer system; I remember only the drain in the middle of the floor. I do not know whether the drain was connected to the town sewer. I am sure that all of the solutions from the process went down the drain that was located in the middle of the floor.

11. There was always a hose with very cold water, constantly running down the drain. I never came to know why. The drain flowed down and underneath the building; I

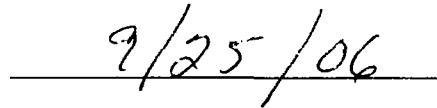
do not think that the drain went out to Salem Street. It seems that if there was a sewer system, it would have been located out towards the street.

12. On one occasion, I stood on the bridge, by the company, and saw dead fish in the Aberjona River. The water was discolored and "muck" covered a lot of the water surface.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in cursive script, appearing to read "Joseph A. Capaldo", written over a horizontal line.

Joseph A. Capaldo

A handwritten date "9/25/06" written in a cursive style, positioned above a horizontal line.

Date